

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**00-0930 CR-HUCK**  
Case No.  
26 U.S.C. § 7206(2)

UNITED STATES OF AMERICA

MAGISTRATE JUDGE  
FLOREN

v.

ROBERT P. RACHLIN,  
Defendant.

FILED BY MR  
00 OCT 31 PM 3:05  
CLERK U.S. DISTRICT COURT  
S.D. OF FL.  
★

**INFORMATION**

The United States Attorney charges that:

**Count 1**

Aiding and Assisting in the Preparation  
and Presentation of a False and Fraudulent Return  
26 U.S.C. § 7206(2)

On or about March 21, 1997, in the Southern District of Florida, the defendant,

ROBERT P. RACHLIN,

a resident of Miami-Dade County, Florida, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a joint U.S. Individual Income Tax Return, Form 1040, of Wanda Martinez and Jerry Lenn for the calendar year 1996, which was false and fraudulent as to a material matter, in that it represented that their joint taxable income for the calendar year 1996, was the sum of \$130,441.00, and that the tax due and owing thereon was the sum of \$32,317.00, whereas as the defendant then and there well knew and believed, their joint taxable income for the calendar year 1996 was substantially in excess of that heretofore stated and that upon said additional taxable income a substantial additional tax was due and owing

*[Handwritten signature]*

to the United States of America.

In violation of Title 26, United States Code, Section 7206(2).

**Count 2**

**Aiding and Assisting in the Preparation  
and Presentation of a False and Fraudulent Return  
26 U.S.C. § 7206(2)**

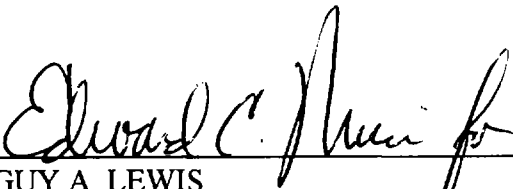
On or about March 29, 1998, in the Southern District of Florida, the defendant,

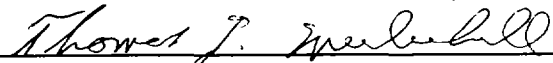
**ROBERT P. RACHLIN,**

a resident of Miami-Dade County, Florida, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a joint U.S. Individual Income Tax Return, Form 1040, of Wanda Martinez and Jerry Lenn for the calendar year 1997, which was false and fraudulent as to a material matter, in that it represented that their joint taxable income for the calendar year 1997, was the sum of \$128,109.00, and that the tax due and owing thereon was the sum of \$30,631.00, whereas as the defendant then and there well knew and believed, their joint taxable income for the calendar year 1997 was substantially in excess of that heretofore stated and

that upon said additional taxable income a substantial additional tax was due and owing to the United States of America.

In violation of Title 26, United States Code, Section 7206(2).

  
GUY A. LEWIS  
UNITED STATES ATTORNEY

  
THOMAS J. MULVIHILL  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

ROBERT P. RACHLIN

CASE NO. 00-0930 CR-HURK  
CERTIFICATE OF TRIAL ATTORNEY\*

## Superseding Case Information

Court Division: (Select One)

☐ Miami    ☐ Key West  
☐ FTL    ☒ WPB    ☐ FTP

New Defendant(s) Yes ☐ No ☐  
 Number of New Defendants ☐  
 Total number of counts ☐

I do hereby certify that:

1. I have carefully considered the allegations of the Information, the number of defendants, the number of probable witnesses and the legal complexities of the Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) NO  
List language and/or dialect \_\_\_\_\_

4. This case will take 1 days for the parties to try.

5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)

I	0 to 5 days	<u>X</u>	Petty	<input type="checkbox"/>
II	6 to 10 days	<input type="checkbox"/>	Minor	<input type="checkbox"/>
III	11 to 20 days	<input type="checkbox"/>	Misdem.	<input type="checkbox"/>
IV	21 to 60 days	<input type="checkbox"/>	Felony	<u>X</u>
V	61 days and over	<input type="checkbox"/>		

6. Has this case been previously filed in this District Court? (Yes or No) NO

If yes:

Judge: \_\_\_\_\_  
(Attach copy of dispositive order)

Case No. \_\_\_\_\_

Has a complaint been filed in this matter? (Yes or No) NO

If yes:

Magistrate Case No. \_\_\_\_\_

Related Miscellaneous numbers: 00-328-CR-HURLEY

Defendant(s) in federal custody as of \_\_\_\_\_

Defendant(s) in state custody as of \_\_\_\_\_

Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) NO

7. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes X No If yes, was it pending in the Central Region? Yes X No

8. Did this case originate in the Narcotics Section, Miami? Yes X No

Thomas J. Mulvihill  
 THOMAS J. MULVIHILL  
 ASSISTANT UNITED STATES ATTORNEY  
 Florida Bar No. 0931209

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
PENALTY SHEET

Defendant's Name: ROBERT P. RACHLIN

00 - 0930 CR - HUCK

Count #: 1 and 2

MAGISTRATE JUDGE  
SECTION

26 U.S.C. §7206(2)

\*Max. Three years of imprisonment.

Count #:

\*Max. Penalty:

Count #:

\*Max. Penalty:

Count #:

\*Max. Penalty:

Count #:

\*Max. Penalty:

**\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**BOND RECOMMENDATION**

**00 - 0930**

DEFENDANT

**ROBERT P. RACHLIN**

**\$100,000 PERSONAL SURETY BOND**

(Surety, Recognizance, Corp. Surety, Cash)  
(Jail) (On Bond) (Warrant) (Summons)  
(Marshal's Custody)

  
THOMAS J. MULVIHILL  
ASSISTANT UNITED STATES ATTORNEY

Last Known Address: 13605 S.W. 104 Ct  
Miami, Florida 33176

What Facility: \_\_\_\_\_

Agent: Special Agent Halverson West, IRS

(FBI) (SECRET SERVICE) (DEA) (IRS) (CUSTOMS)  
(OTHER)